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LAS VEGAS DEVELOPMENT GROUP, LLC

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ***

11 LAS VEGAS DEVELOPMENT GROUP, LLC,)
a Nevada limited liability company,)
12)
Plaintiff,)

Case No. 2:15-cv-00917-GMN-NJK

13 vs.)

14 2014-3 IH EQUITY OWNER, LP, a Delaware)
limited partnership; BANK OF AMERICA,)
15 NA, a National Banking Association;)
MERIDIAN FORECLOSURE SERVICE, a)
16 California corporation; THR NEVADA II, LP a)
Delaware limited partnership; THR)
17 PROPERTY BORROWER, LP, a Delaware)
limited partnership; THR PROPERTY)
18 GUARANTOR, LP, a Delaware limited)
partnership; THR PROPERTY HOLDCO, LP, a)
19 Delaware limited partnership; 2014-3 IH)
PROPERTY HOLDCO, LP, a Delaware limited)
20 partnership; 2014-3 IH BORROWER, LP, a)
Delaware limited partnership; GERMAN)
21 AMERICAN CAPITAL CORPORATION, a)
Maryland corporation; CHRISTIANA TRUST,)
22 an unknown business entity; DOE individuals I)
through XX; and ROE CORPORATIONS I)
23 through XX,)

24 Defendants.)
25)

26 **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND**
TO MOTIONS FOR SUMMARY JUDGMENT
27 **(First Request)**

28 COMES NOW Defendant, LAS VEGAS DEVELOPMENT GROUP, LLC ("*LVDG*"),

1 and hereby moves for an extension of time related to Defendants' pending Motions for Summary
2 Judgment, stating as follows:

- 3 1. On September 12, 2019, Defendants, 2014-3 IH Equity Owner, LP; THR Nevada
4 II, LP; THR Property Borrower, LP; THR Property Guarantor, LP, THR Property
5 Holdco, LP; and 2014-1 IH Property Holdco, LP filed a Motion for Summary
6 Judgment herein [ECF #86]. A response to said Motion was due on October 3,
7 2019.
- 8 2. On September 12, 2019, Defendant, Bank of America, N.A., filed a Motion for
9 Summary Judgment herein [ECF #87]. A response to said Motion was due on
10 October 3, 2019.
- 11 3. When the office of LVDG's counsel received the subject Motions for Summary
12 Judgment, it erroneously calendared the date on which Responses were to be filed.
13 As a result, responses were not timely filed.
- 14 4. LVDG's counsel asserts that the failure to timely file the Responses was the result
15 of excusable neglect.
- 16 5. LVDG respectfully requests that its time to respond to the Defendants' Motions
17 for Summary Judgment [ECF #86, 87] be extended *nunc pro tunc* until October
18 28, 2019.
- 19 6. Counsel for LVDG has corresponded with each of the Movants' counsel and each
20 has advised that he is not opposed to the relief requested.

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1 7. This Motion is made in good faith and not for purpose of delay.

2 DATED this 11th day of October, 2019.

3 ROGER P. CROTEAU & ASSOCIATES, LTD.

4
5 /s/ Timothy E. Rhoda
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14 **LAS VEGAS DEVELOPMENT GROUP, LLC**

15 **IT IS SO ORDERED.**

16 
17 Gloria M. Navarro, District Judge
18 United States District Court

19 **DATED** this 18 day of October, 2019.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of October, 2019, I served via the United States District Court CM/ECF electronic filing system, the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO MOTIONS FOR SUMMARY JUDGMENT (First Request)** to the following parties:

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